

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Douglas Grannan  
300 Walnut Street  
Philadelphia, PA 19106

(b) County of Residence of First Listed Plaintiff Philadelphia County  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Law Offices of Douglas Grannan  
300 Walnut Street, Philadelphia, PA 19106  
(267) 546-9500

## DEFENDANTS

Verizon Wireless  
1 Verizon Way  
Basking Ridge, NJ 07920

County of Residence of First Listed Defendant Somerset County  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF  | PTF                        | DEF                        |
|---|----------------------------|--|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C. § 1692

Brief description of cause:

Abusive Practice and Inadequacy of Laws

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE  
07/09/2014

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

JUL 10 2014

GP

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 300 Walnut St. Philadelphia, PA 19106

Address of Defendant: 1 Verizon Way, Basking Ridge, NJ 07920

Place of Accident, Incident or Transaction: Philadelphia, Indonesia  
(Use Reverse Side For Additional Space)

14 4164

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?  
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases  
(Please specify) 15 U.S.C. §1692

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases

(Please specify) \_\_\_\_\_

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Douglas Grannan, counsel of record do hereby certify:  
☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;  
☐ Relief other than monetary damages is sought

DATE: 7/10/14

15 Douglas Grannan  
Attorney-at-Law

80082  
Attorney I.D.#

JUL 10 2014

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 7/10/14

15 Douglas Grannan  
Attorney-at-Law

80082  
Attorney I.D.#

GP

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Douglas Grannan

v.

Verizon Wireless

CIVIL ACTION

14 4164

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

7/9/14  
Date

Douglas Grannan  
Attorney-at-law

Douglas Grannan  
Attorney for

267-546-9500  
Telephone

267-546-9503  
FAX Number

grannan@critpath.org  
E-Mail Address

JUL 10 2014

4400

14 4164

CIVIL NO.:

Jury Trial Demanded

V.

Jury Trial Demanded

COMPLAINT

## JURISDICTION AND VENUE

2. This court has jurisdiction under the Fair Debt Collection Practices Act 28 U.S.C. § 1331, and 15 U.S.C. § 1692(k). This Court has jurisdiction over the Pennsylvania statute 73 Pa.Cons.Stat. § 201-1 *et seq.*, also known as the

Pennsylvania Unfair Trade Practices Act and Consumer Protection Law (UTPCPL).

3. Venue is proper in this district under 28 U.S.C. § 1391(a)(1) because plaintiffs work in this district and defendants conduct business in this District.

### **PARTIES**

4. Plaintiff Douglas Grannan is a resident of New Jersey with a mailing address of 300 Walnut Street, Philadelphia, PA 19106.
5. Defendant Verizon Wireless, is a Delaware Corporation with a registered office address of 1 Verizon Way Basking Ridge, New Jersey 07920 USA and a mailing address of PO Box PO Box 5029 Wallingford, CT 06492, engaged in the business of providing wireless telephone and data service for a fee.
6. Defendant regularly uses the United States Postal Service and telephone in the collection of consumer debt.
7. Defendant regularly collects or attempts to collect debts for other parties. Defendant is a "debt collector" as that term is defined in the FDCPA.
8. At all times material to the allegations of this Complaint, Defendant was acting as a debt collector with respect to the collection of Plaintiff's alleged debt.
9. With respect to the "Congressional findings and declaration of purpose" portion of the FDCPA, the United States Congress has declared at 15 U.S.C. § 1692:

(a) Abusive practices

There is abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors. Abusive debt collection practices contribute to the number of personal bankruptcies and marital instability, to the loss of jobs, and to invasions of individual privacy.

(b) Inadequacy of laws

Existing laws and procedures for redressing these injuries are inadequate to protect consumers.

**FACTS**

10. Defendant sought to collect a debt from plaintiff arising from an alleged debt incurred by plaintiff for personal, family, or household purposes; more specifically, the debt at issue was allegedly incurred as the result of plaintiff's mobile phone use.
11. On or about April 14<sup>th</sup>, 2014, plaintiff contacted Verizon Wireless to discuss the price structure of international rates for Indonesian voice and data coverage.
12. An unknown Verizon Wireless representative stated to Plaintiff for an additional twenty five dollars (\$ 25.00), an international plan could be added to plaintiff's already existing plan to cover all international charges.
13. Plaintiff agreed to this charge, with the express understanding this charge covered all international voice and data fees.

14. Upon information and belief, Verizon Wireless' stated business practice is to send a confirming email regarding the rate structures for the international rates for wireless voice and data service immediately upon any change to the customer's contract with Verizon Wireless.
15. No such email was sent by Verizon Wireless to confirm the terms of this international rate plan.
16. On April 16<sup>th</sup>, 2014, plaintiff began receiving emails from Verizon Wireless regarding international data charges in excess of one thousand two hundred dollars (\$ 1200.00) over a two and a half hour period beginning at 2:05 AM Eastern Standard Time. Please see Exhibit A.
17. At approximately 5:45 AM plaintiff arose to discover these emails and immediately suspended international service on the plan.
18. Plaintiff asked about these charges and was informed Indonesia was not covered by any international plan.
19. In the clearest possible terms, plaintiff expressed his dissatisfaction regarding the incorrect information provided by the Verizon Wireless representative on April 14<sup>th</sup>, 2014.
20. Plaintiff was assured this matter would be resolved upon the issuance of plaintiff's May Verizon Wireless bill.
21. On or about May 13<sup>th</sup>, 2014, defendant caused to be served upon Plaintiff a bill seeking to collect an alleged debt from Plaintiff. Please see Exhibit B.
22. In the bill, defendant sought to collect more than one thousand dollars (\$ 1000.00) in international calls and data coverage.
23. Plaintiff immediately disputed this bill in writing. Please see Exhibit C.

24. Plaintiff also immediately disputed this bill online and via Verizon Wireless' customer service call in service.
25. Plaintiff never received a response or acknowledgement of his written communication.
26. Plaintiff's repeated calls were met with hold times in excess of one hour, multiple transfers to different representatives, all requiring a complete re-explanation of the events leading up to the dispute, and promises of a call back with a resolution that were never honored.
27. Despite plaintiff's dispute of the validity of this bill, defendant threatened to terminate plaintiff's service if the disputed bill was not paid in full immediately by sending text messages and emails, as well as causing automated collection calls to contact the plaintiff on his mobile phone at two hour intervals on several occasions. Please see Exhibit D.
28. To date no person has contacted plaintiff regarding this issue, except for a periodic renewal of the threat of termination of plaintiff's mobile service.
29. At plaintiff's insistence, Verizon Wireless finally dispatched an email detailing the applicable international rate structure for Indonesia. This was the first notice dispatched in this matter, sent June 26<sup>th</sup>, 2014. Please see Exhibit E.

**COUNT 1- VIOLATION OF 15 U.S.C. § 1692g(b)**

30. Plaintiff re-alleges paragraphs 1-28.
31. Section 809(b) of the FDCPA, 15 U.S.C. § 1692g(b), provides, *inter alia*, that if a consumer notified a debt

collector in writing, within thirty days of the consumer's receipt of the initial communication from the debt collector, that the debt is disputed, the debt collector shall cease collection of the debt until the debt collector obtains and provides verification of the debt to the consumer.

32. In numerous instances, through the means described above, in connection with the collection of debts, when a consumer has notified the debt collector in writing within the thirty-day period described in section 809(a) of the FDCPA, 15 U.S.C. § 1692g(a), that the debt, or a portion thereof, is disputed, Verizon Wireless has filed to obtain and provide verification of the debt to the consumer and has continued to attempt to collect the debt.

33. The acts and practices alleged above constitute violations of § 809(b) of the FDCPA, 15 U.S.C. § 1692g(b). Pursuant to § 814(a) of the FDCPA, 15 U.S.C. § 1692l(a).

**COUNT II: PENNSYLVANIA UNFAIR TRADE PRACTICES ACT AND  
CONSUMER PROTECTION LAW**

34. Plaintiff re-alleges paragraphs 1-32.

35. At all relevant times the UTPCPL, 73 Pa.Cons.Stat. § 201-1 et seq., was applicable to the parties and the transactions at issue in this complaint.

36. Plaintiff entered into a contract from defendant primarily for the personal, family or household purposes within the meaning of § 201-9.2 of the UTPCPL.

37. As described above, defendant has regularly been engaged, as part of its general business practices in a scheme of: wrongfully and fraudulently misrepresenting the terms of international calling features.

38. Defendant used and employed unfair methods of collecting fees and/or unfair or deceptive acts or practices within the meaning of §§ 201-2 and 201-3 of the UTPCPL. Such unfair methods of collection and/or unfair deceptive acts or practices include, but are not limited to fraudulently causing the likelihood of confusion or misunderstanding that the international calling rates were available to the plaintiff when they were in fact not available to the plaintiff.
39. Defendant's misrepresentations, concealment, omissions, deceptions and fraudulent conduct were designed to deceive and to cause misunderstanding and in fact caused plaintiff to be deceived and to misunderstand the amount due and owing for international calling when he did not.
40. Plaintiff actually and reasonably relied on defendant's representations regarding international calling rates.
41. Defendant intended that plaintiff would rely on their misrepresentations, concealment, deceptions and/or omissions concerning the rates for international calling and data coverage.
42. Defendant's violations of the UTPCPL caused damages suffered by plaintiff, because plaintiff would have never knowingly paid such exorbitant rates.
43. Defendant's actions were deliberate, willful and wanton, since it knew no international data coverage was available in Indonesia.
44. Plaintiff has been damaged as a proximate result of defendant's violations of the UTPCPL and has suffered actual, ascertainable losses.
45. As a direct and proximate result of defendant's violations of the UTPCPL as set forth above, plaintiff has

suffered an ascertainable loss of money and are therefore entitled to relief, including damages and treble damages under § 201-9.2 of the UTPCPL.

**CIVIL PENALTIES FOR VIOLATIONS OF THE FDCPA**

46. Section 841(a) of the FDCPA, 15 U.S.C. § 1692l, authorize the Court to award monetary civil penalties for violations of the FDCPA when such violations were committed with actual knowledge or knowledge fairly implied on the basis of objective circumstances. Verizon Wireless' violations of the FDCPA, as alleged in this Complaint, were made with actual knowledge or knowledge fairly implied on the basis of objective circumstances. As specified by the Federal Civil Penalty Inflation Adjustment Act of 1990, 28 U.S.C. § 2861, as amended, the Court is authorized to award a penalty of not more than \$ 16,000 for each violation of the FDCAP.

47. Each instance in which Verizon Wireless has failed to comply with the FDCPA in one or more of the ways described above, constitutes a separate violation of the FDCPA for the purpose of assessing monetary civil penalties. Plaintiff seeks monetary civil penalties for every separate violation of the FDCPA.

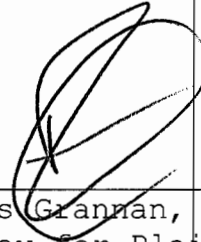
**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, pursuant to 15 U.S.C. §§ 16792l, 1681s, § 201-9.2 of the UTPCPL, and this Court's own equitable powers, respectfully requests that this Court:

1. Award such relief as the Court finds necessary to redress injury to consumers resulting from defendant's violations of the FDCPA including but not limited to rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten gains; and
2. Award plaintiff monetary civil penalties for each violation of the FDCPA as alleged in this Complaint; and
3. Award plaintiff monetary damages based on defendant's violations of the UTPCPL as set forth above, including damages and treble damages under § 201-9.2 of the UTPCPL.
4. Award plaintiff the costs of bringing this action, as well as such other an additional relief as the Court may determine to be just and proper.

Dated: 7/9/14

Respectfully submitted



---

Douglas Grannan, Esq.  
Attorney for Plaintiff  
Law Offices of Douglas Grannan, PC  
300 Walnut Street  
Philadelphia, PA 19106  
(267) 546-9500  
(267) 546-9503 - Facsimile

**DEMAND TO PRESERVE EVIDENCE**

The defendants are hereby demanded to preserve all physical and electronic information pertaining in any way to plaintiff's employment, to her potential claims and her claims to damages, to any defenses to same, including but not limited to electronic data storage, employment files, files, memos, charts, job descriptions, text messages, emails, spreadsheets, images, cache memory, payroll records, paystubs, time records, timesheets, and any other information and/or data which may be relevant to any claim or defense in this litigation.

# EXHIBIT A

**Douglas Grannan**

---

**From:** AccountNotify@verizonwireless.com <eAccountNotify@verizonwireless.com>  
**Sent:** Wednesday, April 16, 2014 2:05 AM  
**To:** [REDACTED]  
**Subject:** Message from Verizon Wireless - International Data Usage Alert



## IMPORTANT ACCOUNT INFORMATION FROM VERIZON WIRELESS.

### **\*\*ATTENTION\*\* International Data Roaming Usage Alert**

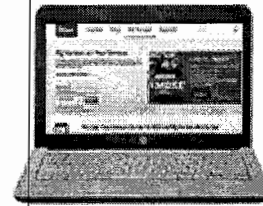
As of 04/16/2014, wireless number ending in 0024 has incurred approximately \$150 in global data charges. Usage is not covered by your allowance plan in all countries.

If you would like to review international data plan options or view a full list of countries covered by your global data plan, please visit <http://www.verizonwireless.com/global> or call 1908-559-4899 from outside of the U.S. to speak to a Global specialist. This call is airtime free from your Verizon Wireless phone and is available 24x7. If you are the Account Owner/ Account Manager, then you can call 1-800-922-0204 from a landline or \*611 from your wireless device when inside the U.S.

To enable/ disable Mobile Data and Wi-Fi services on your device, please refer to your device user guide, also available online at <http://support.vzw.com>. To estimate your data usage based on the activity type, use the online tool at <http://vzw.com/datacalculator>

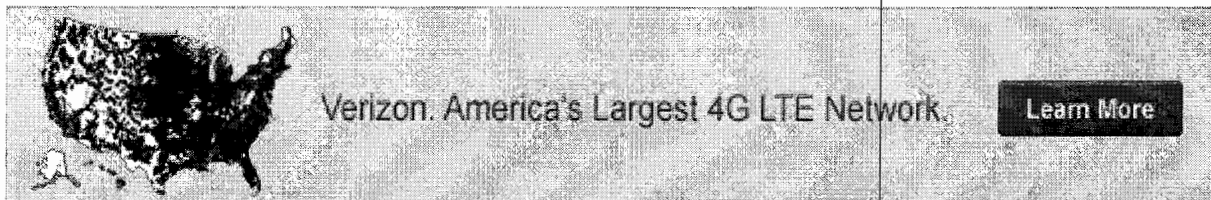
Sincerely,

Verizon Wireless Global Services.



**My Verizon is also available 24/7 to assist you with:**

- Viewing your usage
- Updating your plan
- Adding Account Members
- Paying your bill
- Finding accessories for your devices
- And much, much more...



© 2012 Verizon Wireless

Verizon Wireless | One Verizon Way | Mail Code: 180WVB | Basking Ridge, NJ 07920

We respect your privacy. Please review our [privacy policy](#) for more information

If you are not the intended recipient and feel you have received this email in error; or if you would like to update your customer notification preferences, please [click here](#).

**Douglas Grannan**

---

**From:** AccountNotify@verizonwireless.com <eAccountNotify@verizonwireless.com>  
**Sent:** Wednesday, April 16, 2014 2:05 AM  
**To:** [REDACTED]  
**Subject:** Message from Verizon Wireless - International Data Usage Alert



## IMPORTANT ACCOUNT INFORMATION FROM VERIZON WIRELESS.

### **\*\*ATTENTION\*\* International Data Roaming Usage Alert**

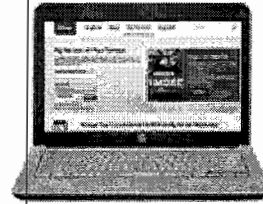
As of 04/16/2014, wireless number ending in 0024 has incurred approximately \$150 in global data charges. Usage is not covered by your allowance plan in all countries.

If you would like to review international data plan options or view a full list of countries covered by your global data plan, please visit <http://www.verizonwireless.com/global> or call 1908-559-4899 from outside of the U.S. to speak to a Global specialist. This call is airtime free from your Verizon Wireless phone and is available 24x7. If you are the Account Owner/ Account Manager, then you can call 1-800-922-0204 from a landline or \*611 from your wireless device when inside the U.S.

To enable/ disable Mobile Data and Wi-Fi services on your device, please refer to your device user guide, also available online at <http://support.vzw.com>. To estimate your data usage based on the activity type, use the online tool at <http://vzw.com/datacalculator>

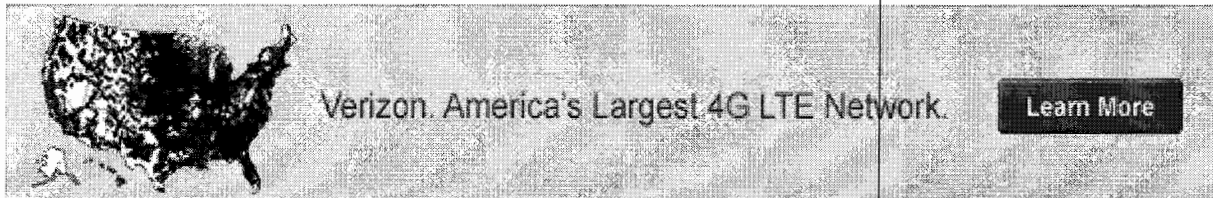
Sincerely,

Verizon Wireless Global Services.



**My Verizon is also available 24/7 to assist you with:**

- Viewing your usage
- Updating your plan
- Adding Account Members
- Paying your bill
- Finding accessories for your devices
- And much, much more...



© 2012 Verizon Wireless

Verizon Wireless | One Verizon Way | Mail Code: 180WVB | Basking Ridge, NJ 07920

We respect your privacy. Please review our [privacy policy](#) for more information

If you are not the intended recipient and feel you have received this email in error; or if you would like to update your customer notification preferences, please [click here](#).

**Douglas Grannan**

**From:** AccountNotify@verizonwireless.com <eAccountNotify@verizonwireless.com>  
**Sent:** Wednesday, April 16, 2014 2:07 AM  
**To:** [REDACTED]  
**Subject:** Message from Verizon Wireless - Warning: Data Service may be interrupted!



## IMPORTANT ACCOUNT INFORMATION FROM VERIZON WIRELESS.

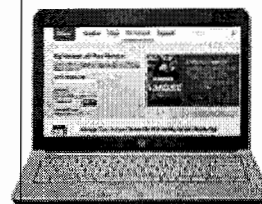
### **\*\*ATTENTION\*\* International Data Roaming Usage Alert**

As of 04/16/2014, [REDACTED] has incurred approximately \$250 in global data charges. Usage is not covered by your allowance plan in all countries. **Data service will be blocked after \$500.**

If you would like to review international data plan options, please visit <http://verizonwireless.com/global> or call +1-908-559-4899 from outside of the US to speak to a Global specialist. This call is airtime free from your Verizon Wireless phone and is available 24x7. If you are the Account Owner/Account Manager then you can call 1-800-922-0204 from a landline or \*611 from your wireless device when inside the US.

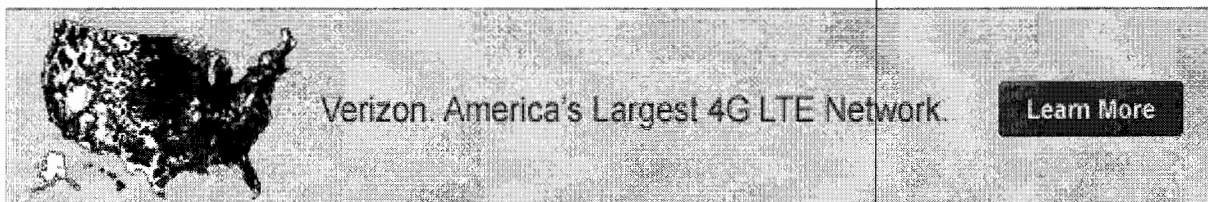
In addition, you may also be able to turn-off Mobile Data service on your device while roaming and connect your device to a local Wi-Fi network to prevent/avoid unintended wireless data roaming charges. To enable/disable Mobile Data and Wi-Fi services on your device, please refer to your device user guide, also available online at <http://support.vzw.com>. To estimate your data usage based on the activity type, use the online tool at <http://vzw.com/datacalculator>.

Sincerely,  
Verizon Wireless Global Services



### **My Verizon is also available 24/7 to assist you with:**

- Viewing your usage
- Updating your plan
- Adding Account Members
- Paying your bill
- Finding accessories for your devices
- And much, much more...



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Verizon Wireless | One Verizon Way | Mail Code: 180WVB | Basking Ridge, NJ 07920

We respect your privacy. Please review our [privacy policy](#) for more information

If you are not the intended recipient and feel you have received this email in error; or if you would like to update your customer notification preferences, please [click here](#).

**Douglas Grannan**

**From:** AccountNotify@verizonwireless.com <AccountNotify@verizonwireless.com>  
**Sent:** Wednesday, April 16, 2014 2:07 AM  
**To:** [REDACTED]  
**Subject:** Message from Verizon Wireless - Warning: Data Service may be interrupted!



## IMPORTANT ACCOUNT INFORMATION FROM VERIZON WIRELESS.

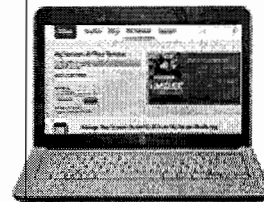
### **\*\*ATTENTION\*\* International Data Roaming Usage Alert**

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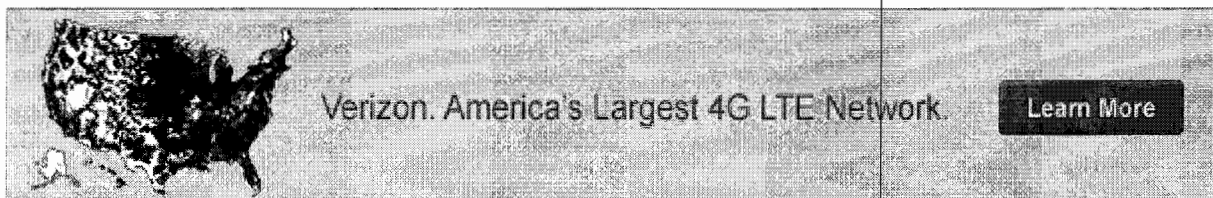
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**Douglas Grannan**

---

**From:** AccountNotify@verizonwireless.com <eAccountNotify@verizonwireless.com>  
**Sent:** Wednesday, April 16, 2014 2:03 AM  
**To:** [REDACTED]  
**Subject:** Message from Verizon Wireless - International Data Usage Alert



## IMPORTANT ACCOUNT INFORMATION FROM VERIZON WIRELESS.

### **\*\*ATTENTION\*\* International Data Roaming Usage Alert**

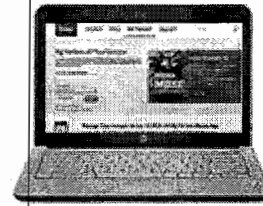
As of 04/16/2014, wireless number ending in 0024 has incurred approximately \$50 in global data charges. Usage is not covered by your allowance plan in all countries.

If you would like to review international data plan options or view a full list of countries covered by your global data plan, please visit <http://www.verizonwireless.com/global> or call 1908-559-4899 from outside of the U.S. to speak to a Global specialist. This call is airtime free from your Verizon Wireless phone and is available 24x7. If you are the Account Owner/ Account Manager, then you can call 1-800-922-0204 from a landline or \*611 from your wireless device when inside the U.S.

To enable/ disable Mobile Data and Wi-Fi services on your device, please refer to your device user guide, also available online at <http://support.vzw.com>. To estimate your data usage based on the activity type, use the online tool at <http://vzw.com/datacalculator>

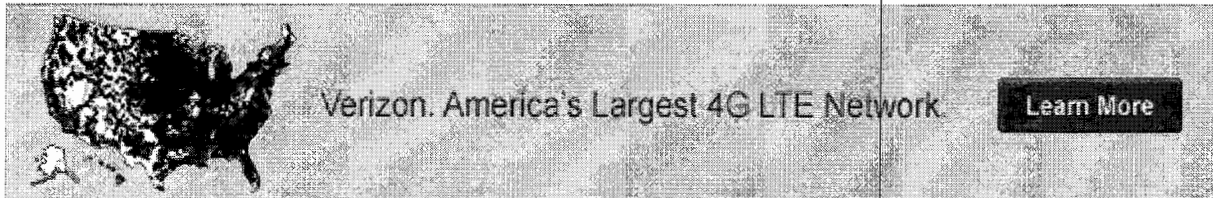
Sincerely,

Verizon Wireless Global Services.



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**Douglas Grannan**

---

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**Sent:** Wednesday, April 16, 2014 2:03 AM  
**To:** [REDACTED]  
**Subject:** Message from Verizon Wireless - International Data Usage Alert



## IMPORTANT ACCOUNT INFORMATION FROM VERIZON WIRELESS.

### **\*\*ATTENTION\*\* International Data Roaming Usage Alert**

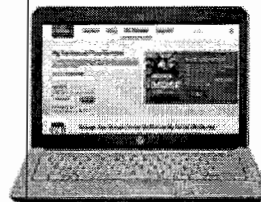
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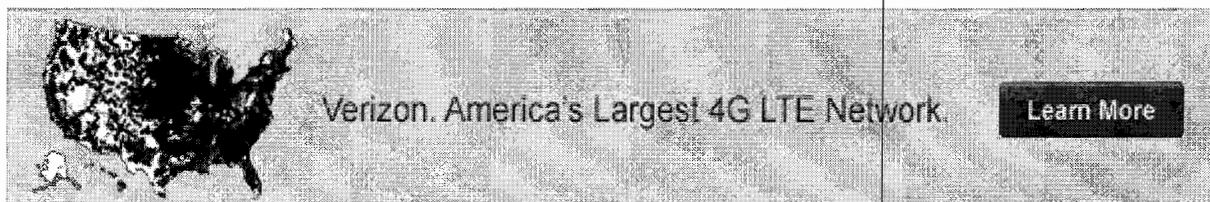
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**Douglas Grannan**

**From:** AccountNotify@verizonwireless.com <eAccountNotify@verizonwireless.com>  
**Sent:** Wednesday, April 16, 2014 4:42 AM  
**To:** [REDACTED]  
**Subject:** Message from Verizon Wireless - Data Services Blocked



## IMPORTANT ACCOUNT INFORMATION FROM VERIZON WIRELESS.

### \*\*\*ATTENTION\*\*\* Data Services Blocked

As of 04/16/2014, [REDACTED] has incurred approximately \$500 in international data roaming charges, and your data service is blocked. Voice (if applicable) and text messaging services remain active.

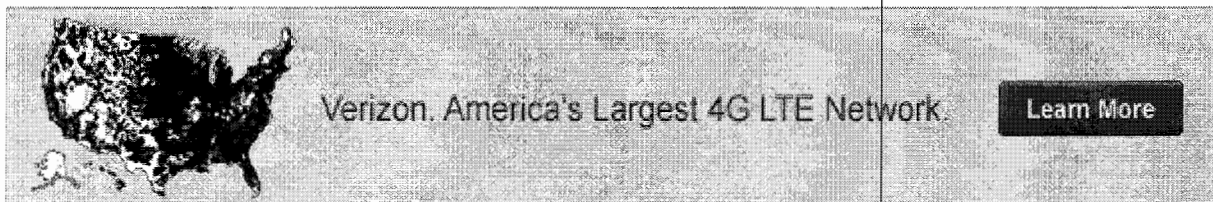
To review global data options, please visit <http://verizonwireless.com/global>. To restore data service, the Account Owner or Account Manager must call to agree to pay existing charges and request restoration of service. Call +1-908-559-4899 from outside of the US, or 1-800-922-0204 from a landline or \*611 from your wireless device when inside the US.

Sincerely,  
Verizon Wireless Global Services



### **My Verizon is also available 24/7 to assist you with:**

- Viewing your usage
- Updating your plan
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- Paying your bill
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**Douglas Grannan**

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**To:** [REDACTED]  
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## IMPORTANT ACCOUNT INFORMATION FROM VERIZON WIRELESS.

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Sincerely,  
Verizon Wireless Global Services



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# EXHIBIT B

DORIS 10:51AM 5/22/14

PO BOX 4003  
ACWORTH, GA 30101

Manage Your Account & View Your Usage Details

Account Number

Date Due

My Verizon at [www.verizonwireless.com](http://www.verizonwireless.com)

Past Due

Address Changed? - go to [vzw.com/changeaddress](http://vzw.com/changeaddress)

Invoice Number

7040838759

10030881 02 AT 0.403 \*\*AUTO T9 0 1513 19106-380800 1 E PHIL1304



DOUGLAS GRANNAN  
[REDACTED] ST  
PHILADELPHIA, PA 19106-3808



**COPY**

7/7/14

**Verizon Wireless News**

**Change To Your Service**

Thank you for your wireless business. You recently made a change to your service. Your new bill will reflect usage from your last bill and service adjustments resulting from the plan/feature change.

**It's a Great Time to Add A Device**

Stay connected to the people and things you love when you add a new smartphone or tablet. See back of bill for details.

**Quick Bill Summary**

Apr 14 - May 13

Previous Balance (see back for details)	\$473.92
Payment - Thank You	-\$234.14
<b>Balance Forward Due Immediately</b>	<b>\$239.78</b>
Account Charges and Credits	
Includes Late Fee of \$5.00	\$5.00
Monthly Charges	\$240.17
Usage and Purchase Charges	\$948.81
Verizon Wireless' Surcharges and Other Charges & Credits	\$26.23
Taxes, Governmental Surcharges & Fees	\$34.85
<b>Total Current Charges Due by June 08, 2014</b>	<b>\$1,255.06</b>

**Total Amount Due**

**\$1,494.84**

Ryan 5/22/14 SUPERVISOR

Our records indicate your account is past due. Please send payment now to avoid service disruption.

Pay from Wireless

Pay on the Web

Questions:

#PMT (#768)

My Verizon at [www.verizonwireless.com](http://www.verizonwireless.com)

1.800.922.0204 or \*611 from your wireless

VE



Bill Date  
Account Number  
Invoice Number

May 13, 2014

[REDACTED]  
7040838759



Please Recycle

DOUGLAS GRANNAN  
[REDACTED] ST  
PHILADELPHIA, PA 19106-3808

**Total Amount Due**

Make check payable to Verizon Wireless.  
Please return this remittance slip with payment.

**\$1,494.84**

\$ [ ] , [ ] [ ] [ ] . [ ] [ ]

P.O. BOX 25505  
LEHIGH VALLEY, PA 18002-5505



Check here and fill out the back of this slip if your billing address has changed or you are adding or changing your email address.

70408387590106236633020000100000125506000001494845



Invoice Number Account Number Date Due Page

7040838759 Past Due 2 of 7

Get Minutes Used	Get Data Used	Get Balance
#MIN + SEND	#DATA + SEND	#BAL + SEND

## Explanation of Charges

### Verizon Wireless' Surcharges

Verizon Wireless' Surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative Charge, which helps defray certain expenses we incur, including: charges we, or our agents, pay local telephone companies for delivering calls from our customers to their customers; fees and assessments on our network facilities and services; property taxes; and the costs we incur responding to regulatory obligations. Please note that these are Verizon Wireless charges, not taxes. These charges, and what's included, are subject to change from time to time.

### Taxes, Governmental Surcharges and Fees

Includes sales, excise and other taxes and governmental surcharges and fees that we are required by law to bill customers. These taxes, surcharges and fees may change from time to time without notice.

### Late Fee Information

A late payment applies for unpaid balances. The charge is the greater of \$5 or 1.5% per month, or as permitted by law.

### Verizon Wireless' Other Charges and Credits

Includes charges for products and services, and credits owing.

## Payments

### Previous Balance

\$473.92

### Payment - Thank You

Payment Received 04/14/14

-234.14

### Total Payments

-\$234.14

### Balance Forward Due Immediately

\$239.78

## Account Charges and Credits

### Late Fee

5.00

### Subtotal

\$5.00

### Account Monthly Charges

MORE EVERY UNL TLK&TXT 6GB

05/14 - 06/13

80.00

### Subtotal

\$80.00

### Total Account Charges and Credits

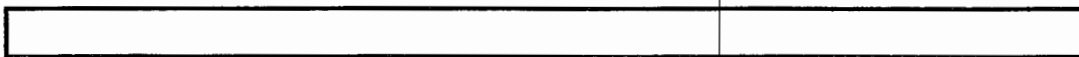
\$85.00

Correspondence Address: Verizon Wireless Attn: Correspondence Team PO Box 5029 Wallingford, CT 06492

### Automatic Payment Enrollment for Account: DOUGLAS GRANNAN

By signing below, you authorize Verizon Wireless to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon Wireless is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon Wireless. Check with your bank for any charges.

1. Check this box.
2. Sign name in box below, as shown on the bill and date.
3. Return this slip with your payment. Do not send a voided check.



### Changing your billing address for Account: 623663302-00001 DOUGLAS GRANNAN

Use this space or sign in to My Verizon at vzw.com/changeaddress to change the mailing address where we send your bill. If we do not have your most recent email address, provide it below and we'll use it to tell you important information about your Verizon Wireless service. Allow 2 billing cycles for the address change to take effect.

New Address \_\_\_\_\_

City \_\_\_\_\_

State/Zip \_\_\_\_\_

Work Phone \_\_\_\_\_ Home Phone \_\_\_\_\_

Email \_\_\_\_\_

### Confirming or changing your service address

For each of your mobile numbers, in order to bill taxes and surcharges correctly we need a service address - which is a street address (not a PO Box) that is the home or primary business address of the person who uses that number. To confirm or change the service address for any of your mobile numbers, sign in to My Verizon at vzw.com/serviceaddress.

Invoice Number Account Number Date Due Page

7040838759 [REDACTED] Past Due 3 of 7

## Overview of Lines (Includes Plan Change)

### Your Account's Plan

#### MORE EVERY UNL TLK&TXT 6GB

\$80.00 monthly charge

6 monthly GB allowance

\$15.00 per GB after allowance

### Breakdown of Charges

Account Charges & Credits	pg 2	\$85.00
[REDACTED]	pg 3	\$55.83
Douglas Grannan		
[REDACTED]	pg 4	\$1,068.72
Douglas Grannan		
[REDACTED]	pg 5	\$45.51
Douglas Grannan		
<b>Total Current Charges</b>		<b>\$1,255.06</b>

### Breakdown of Shared Usage

		SharePlan Minutes Used	SharePlan Messaging Used	SharePlan Data GB Used
267-318-8954	pg 3	980	3,854	.397
609-828-0024	pg 4	201	1,887	0
856-220-8056	pg 5	197	1,121	.098
<b>Total Used</b>		<b>1,378</b>	<b>6,862</b>	<b>.495</b>
<b>Shared Allowance</b>		<b>unlimited</b>	<b>unlimited</b>	<b>6.000</b>
<b>Overage</b>		<b>0</b>	<b>0</b>	<b>0</b>
<b>Total Shared Usage Charges</b>		<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>

### Summary for Douglas Grannan: [REDACTED]

### Your Plan

#### MORE EVERY UNL TLK&TXT 6GB

Have more questions about your charges?  
 Get details for usage charges at  
[www.verizonwireless.com](http://www.verizonwireless.com). Sign into My  
 Verizon to View Online Bill and click on  
 Calls, Messages & Data.

### Monthly Charges

Smartphone Line Access	05/14 - 06/13	40.00
Total Equipment Coverage - Asurion	05/14 - 06/13	8.00
		<b>\$48.00</b>

### Usage and Purchase Charges

Voice	Allowance	Used	Billable	Cost
SharePlan	minutes	unlimited	980	--
Mobile to Mobile	minutes	unlimited	233	--
Night/Weekend	minutes	unlimited	155	--
International Long Distance - Mobile				1.69
<b>Total Voice</b>				<b>\$1.69</b>
<b>Messaging</b>				
Text, Picture & Video	messages	unlimited	3854	--
<b>Total Messaging</b>				<b>\$0.00</b>

## Usage and Purchase Charges, continued

Data	Allowance	Used	Billable	Cost
Gigabyte Usage <i>gigabytes</i>	6.000 (shared)	.397	--	--
Total Data				\$0.00
<b>Total Usage and Purchase Charges</b>				<b>\$1.69</b>
<b>Verizon Wireless' Surcharges+</b>				
Fed Universal Service Charge				1.07
Regulatory Charge				.21
Administrative Charge				.88
				<b>\$2.16</b>
<b>Taxes, Governmental Surcharges and Fees+</b>				
NJ 911 System/Emerg. Resp. Fee				.90
NJ State Sales Tax				3.08
				<b>\$3.98</b>
<b>Total Current Charges for [REDACTED]</b>				<b>\$55.83</b>

+Percentage-based taxes, fees, and surcharges apply to charges for this line, including overage charges, plus this line's share of account charges.

## Summary for Douglas Grannan: [REDACTED] (Includes Plan Change)

### Your Plan

**MORE EVERY UNL TLK&TXT 6GB**  
(see pg 3)

**Plan from 4/14 – 5/12**  
**Global Data \$25 for Each 100MB**  
\$25.00 monthly charge  
100 monthly allowance

Have more questions about your charges?  
Get details for usage charges at  
[www.verizonwireless.com](http://www.verizonwireless.com). Sign into My  
Verizon to View Online Bill and click on  
Calls, Messages & Data.

### Monthly Charges

Smartphone Line Access	05/14 – 06/13	40.00
Global Data \$25 for Each 100MB	04/14 – 05/12	24.17
\$25.00 per month / 29 days on plan		
Total Equipment Coverage – <b>Asurion</b>	05/14 – 06/13	8.00
		<b>\$72.17</b>

### Usage and Purchase Charges

Voice	Allowance	Used	Billable	Cost
SharePlan <i>minutes</i>	unlimited	201	--	--
Mobile to Mobile <i>minutes</i>	unlimited	61	--	--
Night/Weekend <i>minutes</i>	unlimited	178	--	--
411 Search <i>calls</i>	--	2	2	3.98
International Long Distance – Landline				105.47
International Long Distance – Mobile				15.92
Total Voice				\$125.37
<b>Messaging</b>				
Text, Picture & Video <i>messages</i>	unlimited	1887	--	--
Total Messaging				\$0.00
<b>Roaming</b>				
<b>Current Voice Usage</b>				
Roaming Minutes <i>minutes</i>	--	235	235	633.25

Add a new device to

## CONNECT IN MORE WAYS.

Now's the perfect time to add a new device to your account. Keep your family connected no matter where they are when you add a smartphone. Or, enjoy your favorite movies, books and games on the go with a connected tablet.

### Get More to Share

Add a new device on The MORE Everything Plan and get shareable data for every line on your account. Learn more at [vzw.com/moreeverything](http://vzw.com/moreeverything).

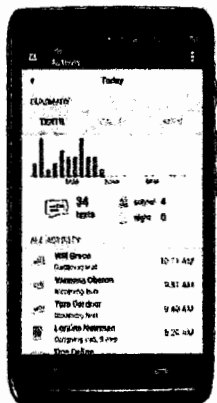


[vzw.com/addaline](http://vzw.com/addaline) | 1.877.615.3777 | Visit a Verizon store near you

BATE0414

With Verizon FamilyBase,<sup>TM</sup>

## YOUR KIDS ARE IN SAFE HANDS.



Manage how and when your children are connecting with FamilyBase. That way, you can have peace of mind knowing that they're using their phones responsibly.



View and Manage  
Activity



Lock Phones  
on Demand



Manage Data, Voice  
and Messaging Usage



Allow or Block  
Contacts



Schedule Time  
Restrictions

3 Months FREE\* | [FamilyBase.vzw.com](http://FamilyBase.vzw.com)

\*Cancel anytime via My Verizon within first three months to avoid being charged \$5/mo. per account thereafter. Verizon FamilyBase Companion app required to use certain features. Compatible phone req'd. accuracy of info is not guaranteed; certain restrictions, subscription and add'l charges may apply for download and use. Credit may not appear on first bill. © 2014 Verizon Wireless

IFCE0414

Life is easier with

## PAPERLESS BILLING.

Reduce clutter and save time by signing up for Paperless Billing. You'll have 24-hour online bill access via My Verizon and an email or text message will remind you when your bill is ready, so you never miss a payment.

Helping the environment has never been more convenient.

Enroll today | [vzw.com/gogreen](http://vzw.com/gogreen)



HSCE0414



Invoice Number Account Number Date Due Page

7040838759 [REDACTED] Past Due 5 of 7

## Usage and Purchase Charges, continued

Roaming	Allowance	Used	Billable	Cost
<b>Current Data Usage</b>				
Text Global Roaming – Sent <i>messages</i>	--	344	344	172.00 ✓?
Text Global Roaming – Rcv'd <i>messages</i>	--	330	330	16.50
Global Roam – Shared – Hong Kong (04/14 – 05/12) <i>megabytes</i>	--	1	--	--
Total Roaming				\$821.75 ✓?
<b>Total Usage and Purchase Charges</b>				<b>\$947.12</b>
<b>Verizon Wireless' Surcharges+</b>				
Fed Universal Service Charge				21.10
Regulatory Charge				.21
Administrative Charge				.88
				<b>\$22.19</b>
<b>Taxes, Governmental Surcharges and Fees+</b>				
NJ 911 System/Emerg. Resp. Fee				.90
NJ State Sales Tax				26.34
				<b>\$27.24</b>
<b>Total Current Charges for [REDACTED]</b>				<b>\$1,068.72</b> [REDACTED]

+Percentage-based taxes, fees, and surcharges apply to charges for this line, including overage charges, plus this line's share of account charges.

## Summary for Douglas Grannan: [REDACTED]

## Your Plan

**MORE EVERY UNL TLK&TXT 6GB**  
(see pg 3)

Have more questions about your charges?  
Get details for usage charges at  
[www.verizonwireless.com](http://www.verizonwireless.com). Sign into My  
Verizon to View Online Bill and click on  
Calls, Messages & Data.

## Monthly Charges

Smartphone Line Access	05/14 – 06/13	40.00
		<b>\$40.00</b>

## Usage and Purchase Charges

Voice	Allowance	Used	Billable	Cost
SharePlan <i>minutes</i>	unlimited	197	--	--
Mobile to Mobile <i>minutes</i>	unlimited	138	--	--
Night/Weekend <i>minutes</i>	unlimited	2	--	--
Total Voice				\$ .00
<b>Messaging</b>				
Text, Picture & Video <i>messages</i>	unlimited	1121	--	--
Total Messaging				\$ .00
<b>Data</b>				
Gigabyte Usage <i>gigabytes</i>	6.000 (shared)	.098	--	--
Total Data				\$ .00
<b>Total Usage and Purchase Charges</b>				<b>\$ .00</b>



Invoice Number Account Number Date Due Page

7040838759 [REDACTED] Past Due 6 of 7

## Monthly Charges, continued

### Verizon Wireless' Surcharges+

Fed Universal Service Charge	.79
Regulatory Charge	.21
Administrative Charge	.88
	<b>\$1.88</b>

### Taxes, Governmental Surcharges and Fees+

NJ 911 System/Emerg. Resp. Fee	.90
NJ State Sales Tax	2.73
	<b>\$3.63</b>

**Total Current Charges for [REDACTED] \$45.51**

+Percentage-based taxes, fees, and surcharges apply to charges for this line, including overage charges, plus this line's share of account charges.



Invoice Number Account Number Date Due Page  
7040838759 [REDACTED] Past Due 7 of 7

## Need-to-Know Information

### Customer Proprietary Network Information (CPNI) Notice

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We will share CPNI among our affiliates and parent companies (including Vodafone), and their subsidiaries so they may market communications-related products and services to you. CPNI will not be shared with unrelated third parties for their own use.

You may choose not to have your CPNI shared for the marketing purposes described above by notifying us by phone any time at 1-800-333-9956, online at [www.vzw.com/myprivacy](http://www.vzw.com/myprivacy) or through Customer Service at 1-800-922-0204 from 6 a.m. to 11 p.m.

Unless you notify us in one of these ways, we may share your CPNI with authorized companies as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about sharing your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI Notice does not apply to residents of the state of Arizona.

### Limiting Notations On Payments

Written notations included with or on your payment cannot be reviewed when bills are processed and will not be honored. Please send such notated payment and any accompanying correspondence to the Correspondence Address on Page 2 of your bill.

### Electronic Fund Transfer (EFT)

Your check authorizes us either to make a one-time electronic funds transfer (EFT) from your account or process as a check. An EFT may be withdrawn from your account the same day you make your payment and your check is not returned to you. If you want to be excluded from EFT, please call 1-866-544-0401. If payment is returned unpaid, you authorized us to collect an additional \$25 fee through EFT from your account.

### Experiencing A Problem With Your Verizon Wireless Device?

Just contact us toll-free at 1-866-406-5154 from a landline phone. If we can't resolve the problem and the problem is caused by a manufacturing defect within the first year you own the device, we'll send you a Certified Like-New Replacement (either a like unit or one of comparable quality) right to your door.

### Returned Payments

In the event your check for payment of your wireless bill is returned by your bank for insufficient or uncollected funds, Verizon Wireless may resubmit your check electronically to your bank for payment from your checking account.

### Do Not Let Your Kids Play With Old Cell Phones

Because old cell phones are still able to call 9-1-1 even if they are not active with a wireless carrier, they should not be used as a toy. If you have an old cell phone, please consider donating it to Verizon's Hopeline program, where old phones are safely recycled and the proceeds used to help prevent domestic violence.

### Save Time – Pay Your Bill Online

It's fast, easy and secure. Best of all, you can do it from your home, office or any computer with an Internet connection. Go to [www.vzw.com/myverizon](http://www.vzw.com/myverizon).

### Be The Envy Of Your Friends This Summer

Planning an international getaway? Share your adventures with your friends and family while you're away. Post updates to favorite social networks, message photos, or call to share the day's news. Before you go, check our Interactive Trip Planner to determine if your device will work in your destination and to get information on the global services that are right for you. With coverage in over 200 countries, and a variety of affordable global voice, data and messaging plans to choose from, you can easily share your experiences while away. Visit [go.vzw.com/globalsvcs](http://go.vzw.com/globalsvcs).

# EXHIBIT C

DOUGLAS A. GRANNAN

ATTORNEY AT LAW

THE SUITES AT FORT WILSON  
300 WALNUT STREET  
PHILADELPHIA, PENNSYLVANIA 19106  
(215) 407-8030  
FAX (215) 829-9169  
grannan@critpath.org

Admitted to PA and NJ

May 22<sup>nd</sup>, 2014

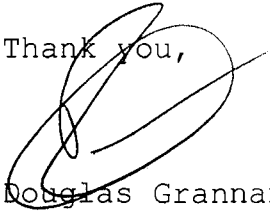
Verizon Wireless  
PO Box 5029  
Wallingford, CT 06492

Re: Account # 623663302-00001  
BILL DISPUTE  
(609) 828-0024

Dear Sir or Madam:

My name is Doug Grannan. You have issued a bill with a series of unexplained, unsubstantiated charges. Your representative informed me a single \$ 25 charge would cover all international charges for the above referenced phone number during a brief trip to Indonesia. Now you are charging me over \$ 1000. This is not accurate. Please produce all records relating to this alleged debt. I dispute the validity of this alleged debt.

Thank you,

  
Douglas Grannan

# EXHIBIT D

**Subject:** [No Subject]

**From:** [REDACTED]

**To:** [REDACTED]

**Date:** Wednesday, July 9, 2014 11:53 AM

VZW FREE MSG: Important - your wireless account is past due. To make a payment click/sign in to <http://mobile.vzw.com/paybill> or call 800-754-0961.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

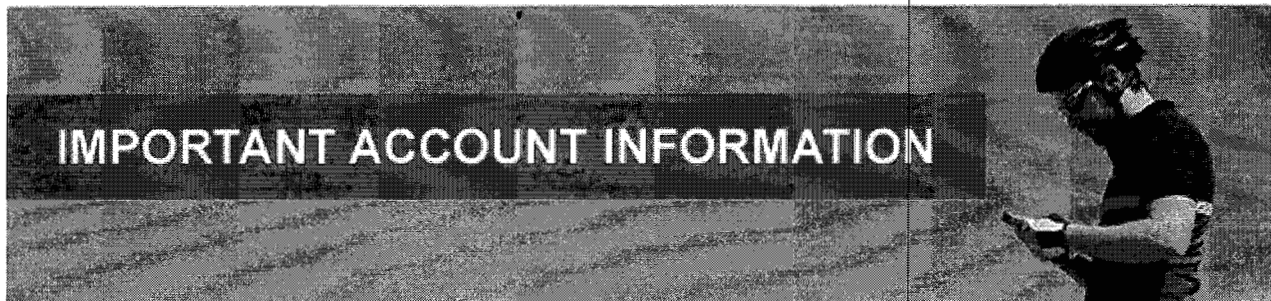
**Douglas Grannan**

**From:** Verizon Wireless <verizonwireless2@email.vzwshop.com>  
**Sent:** Tuesday, June 17, 2014 1:25 PM  
**To:** [REDACTED]  
**Subject:** Your Past Due Verizon Wireless Account



[View Online](#) 

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Account Number [REDACTED]

Dear Douglas,

Your Verizon Wireless account balance is still past due. If a payment is not made in full immediately, we may suspend services on your account and a \$15 per line reconnection fee will be charged to reinstate your account.

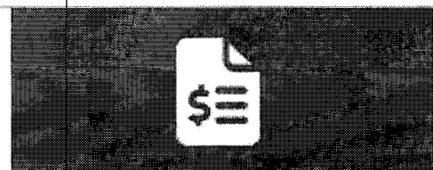
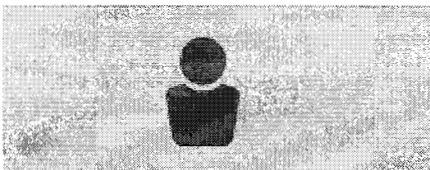
If you have questions about your bill, please feel free to contact Verizon Wireless Customer Financial Services by calling **1.866.266.1445**.

Paying your bill is simple; we accept checks, debit cards and most major credit cards. Payments can be made 24 hours a day, free of charge.

You can choose from any of the following options to pay your bill:

- Sign into [My Verizon](#)
- Visit our secure payment website at [www.verizonwireless.com/paymybill](http://www.verizonwireless.com/paymybill)
- Dial #PMT on your Verizon Wireless phone
- Call us immediately at **1.866.266.1445**

If you have already made this payment or upgraded your plan, please disregard this notice. Thank you for choosing Verizon Wireless, we truly value your business.



**Manage Your Account Online**

Check your minutes, usage and balance online with My Verizon.

[Register or Sign in now](#)

**On the Right Plan?**

Run an Account Analysis to make plan and service changes based on your usage.

[Run Analysis Now](#)

**Set Payment Options**

Pay your bill automatically, straight from your account with Auto Pay.

[Sign in or Enroll Now](#)



Locate a Verizon Wireless Store

Stay Connected:



**Quick Links:**

[My Verizon](#)

[Phones & Devices](#)

[Accessories](#)

[Plans](#)

[Support](#)

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We respect your privacy. Please review our [privacy policy](#) for more information about click activity with Verizon Wireless and links included in this email.

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Verizon Wireless | One Verizon Way | Mail Code: 180WVB | Basking Ridge, NJ 07920

# EXHIBIT E

**Douglas Grannan**

**From:** GlobalServices@VerizonWireless.com  
**Sent:** Thursday, June 26, 2014 2:53 PM  
**To:** [REDACTED]  
**Subject:** Verizon Wireless Global Rates & Dialing Instructions



To ensure our emails reach your inbox, please add  
 verizonwireless@email.vzwshop.com to your address book.

**My Verizon**

**Support**

**International Services**

**Global Superpower.**  
 Coverage in More than 200 Countries.

**Global Rates**

See below for traveling outside of the U.S.:

Destination	Voice Calls Per Minute		Text Messaging		Multimedia Messaging (Picture and Video) To/FROM	Global Data		
	Standard Global Rate	With \$4.99 Global Value Plan	Sent (Per Address)	Received (Per Message)	To/From US, Canada, Mexico, Puerto Rico Mobile Numbers	To/From Mobile Numbers of Other Countries	\$25 for 100 MB (Overage \$25/100 MB)	Pay As You Go With NO Allowance
<u>Indonesia</u>	\$2.89	Standard Global Rate	\$0.50	\$0.05	Per Your Domestic Plan + Applicable Global Data Charges	\$0.50 Send/ \$0.25 Receive + Applicable Global Data Charges	Allowance <b>NOT</b> Available/Pay As You Go Only	\$0.020/KB (\$20.48/MB)

**Voice and Messaging**

- Business customers may have different rates than the current Consumer rates listed above. Confirm rates with Business Account Owners/Managers.
- Global per minute rates apply when checking Voice Mail.
- For Visual Voice mail, only data usage applies.
- Unlike Voice or Text rates that depend on the country you're in, Multimedia Messaging is rated like you're in the U.S. The rate depends on who you're messaging.
- Important: Global Data charges apply to Multimedia Messaging (based on the attachment size), in addition to the per message charge.
- When sending messages, you're charged per message/per address. (If you send one message to 3 people, you're charged for 3 messages.)

**Data**

- Business customers may have different data pricing than rates listed above. Confirm rates with Business Account Owners/Managers.
- Global Data charges can add up quickly. We recommend adding a global data feature prior to travel for eligible countries.
  - To avoid proration, backdate it to the beginning of your bill cycle and keep it until the end of the bill cycle following your return.
- To manage data usage, review:
  - [Global Travel Data Usage Tips](#)
  - Our [Data Calculator](#) to estimate usage.
- If you don't plan on using data while traveling, go to "settings" in your device and turn data services off.
- At least one of your countries is served by a CDMA network for voice service but requires a GSM network for data. You may need to manually select the GSM network to get a data connection. Check your manual for instructions.

**Dialing/Messaging Instructions below**

Country Code	Dial Network	From	To	Instruction
62	CDMA	Indonesia	U.S.	Dial 001 then 1 then ten digit U.S. number
62	CDMA	Indonesia	Local	Dial local number
62	CDMA	Indonesia	Other Countries	Dial 00 then Country Code then international number
62	CDMA	Indonesia	Customer Service	Dial 001 then 908-559-4899
62	GSM	Indonesia	U.S.	Dial Plus Sign then 1 then ten digit U.S. number
62	GSM	Indonesia	Local	Dial Plus Sign then Country Code then Local Number with Area Code (if applicable)
62	GSM	Indonesia	Other Countries	Dial Plus Sign then Country Code then international number
62	GSM	Indonesia	Customer Service	Dial Plus Sign then 1 then 908-559-4899
62	None	Indonesia	Customer Service from a landline	Dial Access Code: 001-801-11 (Indosat) or 007-801-11 (PT Telkom) then follow Calling Card Dialing Instructions (below)

- On most devices, the plus sign (+) will appear when you press and hold the **0** key or the \* key. Check your device manual if needed.
- Your device may have an International Dial key that automatically inserts the exit code for outbound calls.
- To check your Voice Mail, use the "From the Country to the US" instructions and call your mobile number. Press # to interrupt the greeting and enter your password when prompted.
- **Trouble with your device?** If you can't place a call from your VZW device, reach Global Support toll-free from any landline phone using these **Calling Card Dialing Instructions**:
  1. Dial the toll-free access code for the country you are in (See Dialing Instructions above).
  2. After the tone, enter your Verizon Wireless calling card number and PIN. (Calling Card Number: 9085594899 PIN: 2392)
  3. After the tone enter 0-908-559-4899.
  4. The VZW Global Roaming Hotline will then prompt you to enter your 10-digit mobile number.
- Instructions apply only to Verizon Wireless devices.

**Global Device**

- Before leaving the U.S.:
  - 3G voice devices - update your PRL by dialing \*228 SEND, select option 2
  - 4G voice devices - ensure the device has the current software version and establish a data session on the VzW network
- Please be aware for most voice devices, the default setting for Data Roaming is OFF. To use data, you must enable this feature by either:
  - Selecting 'Enable Data' via a pop-up message on your device when powering up outside the U.S. OR
  - Making the change in device settings. Consult your Device Manual (under the device image) on our [Support page](#)

**Travel Tips**

- Visit [www.vzw.com/global](http://www.vzw.com/global) to see our full suite of Global Services, view country coverage maps and plan your next trip with our [Trip Planner](#) tool.
- You can add global features via the [Change Features and My Device](#) screens in My Verizon/My Business OR contact Customer Service via 611 from your wireless device/800-922-0204 from a landline.

Need assistance while roaming internationally? Call our support line 24/7. 1.908.559.4899

To view our privacy policy, [click here](#).

To unsubscribe from Verizon Wireless e-mailings, [click here](#).

Please do not reply to this email. To contact Customer Service, please visit [verizonwireless.com](http://verizonwireless.com) and Click on Contact Us.

Rates are effective as of the date of this mail, and may change without notice.

Rates and other terms and conditions apply to consumer customers. Business customers' rates and other terms and conditions may vary; please refer to your company's agreement with us for additional information.